UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GREGORY COLBURN et al.,

Defendants.

Cr. No. 19-10080-NMG

MOTION TO MODIFY PROTECTIVE ORDER GOVERNING DOCUMENTS RECEIVED FROM USC

The undersigned respectfully requests that the Court modify the current protective order governing documents produced by USC to Defendant John Wilson (Dkt. No. 814) to permit Defendant Wilson to share such documents with defendants in case 1:19-cr-10081-IT. Defense counsel have conferred with counsel for USC regarding this Motion. USC consents to the relief requested on the condition that defendants in case 1:19-cr-10081-IT are not provided with any documents covered by the protective order unless they sign the protective order and agree to be governed by its terms.

Dated: April 29, 2021 Respectfully submitted:

Counsel to John Wilson:

/s/ Michael Kendall Michael Kendall (BBO # 544866) WHITE & CASE LLP 75 State Street Boston, MA 02109-1814 (617) 979-9310 michael.kendall@whitecase.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the forgoing was filed electronically on April 29, 2021, and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing.

/s/ Michael Kendall
Michael Kendall